

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**UNITED STATES' SUPPLEMENTAL BRIEF REGARDING RESTITUTION**

The United States of America respectfully submits this supplemental brief regarding the restitution payment it previously requested on behalf of Analog Devices, Inc. (“ADI”), a Title 18 property offense victim who suffered a pecuniary loss in this case. 18 U.S.C. §§ 3663A(c)(1)(A)(ii), (B). The government’s previous memo requested restitution of \$609,915. Dkt. No. 406 at 1. Since the government submitted that memo, ADI has informed that its previous legal expense calculations were unintentionally overstated by \$3,036.34. Therefore, the government hereby amends its previous restitution request and now respectfully asks that the court order restitution to ADI in the amount of \$606,879.

As described in the government’s previous memo, WilmerHale initially represented ADI in its response to a Grand Jury subpoena issued early in the government’s investigation. Dkt. No. 406 at 2. WilmerHale had previously provided ADI with copies of invoices related to its representation. The government attached these invoices as Exhibit 1 to its previous memo. Dkt. No. 406, Ex. 1. However, WilmerHale recently discovered that certain time entries were inadvertently classified as being for this case, when they were actually associated with work performed for ADI on an unrelated matter. These time entries, totaling \$2,994, were documented as:

- 2.6 hours on ADI's October 19, 2018, bill;
  - The first three entries totaling 1.1 hours on ADI's November 27, 2018 bill; and

- 0.2 hours of attorney time on ADI's October 21, 2019, bill.

In addition to these attorneys' fees, there are two Federal Express charges on the November 27, 2018, bill, totaling \$42.34, that are not attributable to the *Yu* matter. Therefore, in total, the government's previous request included \$3,036.34 in fees that were not incurred as a result of the defendant's crime.

The government hereby amends its previous restitution request and now asks that this court order the defendant to pay \$606,879 in restitution to ADI. The government is submitting updated copies of these three invoices directly to the court and renews its request that they be kept under seal.

Respectfully submitted,

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Dated: October 25, 2023